1. It is noted in several places that scrap metal stockpiles obstruct access to catch basins depending on the amount of inventory onsite. The NPDES permit requires the proper operation and maintenance of all facilities or systems installed to achieve compliance with the terms and conditions of the permit, which include the catch basins. SIM needs to keeps records of the conditions of these catch basins as they become cleared of inventory and eligible for maintenance. If upon inspection, these catch basins are not functioning properly due to the inability to clean them out frequently enough, inventory and access routes should be reconfigured to allow proper drainage.

2. Page 2-1: Paragraph 3 says that dust suppression and cooling water not evaporated at the hammer mill of the automobile shredder is routed through a designated meter to the sanitary sewer system. However, on page 4-9, the text indicates that unconsumed combustion suppression water from the shredder and pavement wash-down water go to the stormwater detention tank. Any water used in the shredder or as wash-down water becomes process water and must meet technology based limits. All Known Available and Reasonable Treatment (AKART) for this facility is zero discharge of process water, with evaporation and discharge to the sanitary sewer determined to be the technologies meeting the technology based limit and AKART.

3. Page 3-6: Runoff from the administrative parking lot and building roof drains is currently routed to the municipal storm drain and the Duwamish. Parking lot runoff is treated in an oil/water separator prior to discharge. Data obtained by EPA and City of Seattle staff indicate that dust from operations is settling on these areas and that the runoff should receive treatment for permitted parameters prior to discharge. All stormwater discharges at the site contaminated by industrial operations are considered industrial wastewater as per WAC 173-240-020(8) and must be evaluated for impacts to the LDW in order to develop effective treatment options. See comment 4 on the attached Stormwater Quality Report comments.

4. Page 4-21: Stormwater reuse. Stormwater reuse should be explored further. Any amount of stormwater that evaporates or becomes process water discharging to the POTW is stormwater not directly discharging to the LDW Superfund site. In addition, the report should evaluate reusing larger amounts of stormwater to better control dust from the shredder, possibly helping to reduce contamination of runoff noted in comment 3 above.

5. Page 4-24: Roof operational areas. The text states that Ecology recommended roofing the site, but it is infeasible. It also states that during the original permitting, roof runoff treatment was not required. Since the original permitting was done, data has been collected indicating that roof runoff should be treated (see comment 3 above and comment 4 on the attached Stormwater Quality Report

comments). The text should address other options, including treatment of the roof runoff.

6. Page 4-24: Discharge to sanitary sewer. The text states that sanitary discharge as a stormwater treatment option has been eliminated at SIM, but it does not go into detail. Discharge to the sanitary sewer should be explored again and evaluated against the potential added costs for treating runoff referenced in comment 3 above. This discussion should also evaluate any reduction of impacts to the LDW Superfund site obtained by removing the discharge. Reduction of impacts to the LDW would assist with the source control needed to bring the LDW sediment site closer to cleanup levels.

7. Page 4-26, Table 4.4: Wave Ionics and WWIX column headings are switched.

8. Page 4-31: A mixing zone analysis for the site must encompass all stormwater discharges that are determined to have been contaminated by industrial operations, which may include stormwater from more than Outfall 001 (see comment 3 above and attached source control comments on the Stormwater Quality Report).

9. Page 4-36: EPA agrees that more TSS data is needed and further evaluation must be done on suspended material in SIM's discharge to better characterize the impacts on the LDW.